

EXHIBIT 45

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Attorneys for Defendant MENZIES
AVIATION, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Renaldo Navarro,

Plaintiff,

vs.

Menzies Aviation, Inc., DOING BUSINESS AS
MENZIES; and DOES 1 through 10, inclusive,

Defendants.

Case No. 3:19-cv-8157

**SUPPLEMENTAL DECLARATION OF
CHRISTOPHER WARD**

State Court Action Filed: 10/23/19

Action Removed: December 16, 2019

SUPPLEMENTAL DECLARATION OF CHRISTOPHER WARD

I, Christopher Ward, declare as follows:

1. I am an attorney admitted to practice before all state and federal courts in the State of California, including the United States District Court for the Northern District of California, and a partner at Foley & Lardner LLP, counsel of record for Defendant Menzies Aviation, Inc. I have personal knowledge of the facts contained in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. On March 17, 2020, Plaintiff's counsel served on me Plaintiff's Fed. R. Civ. P. 26(a)(1) Initial Disclosures. A true and correct copy of Plaintiff's Initial Disclosures produced to me by Plaintiff's counsel is attached hereto as **Exhibit 46**.

3. On July 27, 2020, Plaintiff's counsel deposed Menzies' Duty Manager John Qualley for a first time, and on July 28, 2020, Plaintiff's counsel completed the deposition of Mr. Qualley. Following those depositions, in addition to receiving certified copies of the transcripts of both depositions, I received condensed copies of the transcripts of both depositions, and I have read, reviewed and maintained a copy of those transcripts in connection with this matter. A true and correct copy of Volume I of the condensed transcript of Mr. Qualley's deposition is attached hereto as **Exhibit 47**, and a true and correct copy of Volume II of the condensed transcript of Mr. Qualley's deposition is attached hereto as **Exhibit 48**. Because Exhibits 47 and 48 are offered in their entirety to show Plaintiff's counsel never inquired about certain allegations made by Plaintiff regarding Andrew Dodge, making the entire deposition transcripts relevant, I am providing the condensed transcripts to reduce the amount of material filed with the Court.

4. On August 25, 2020, Plaintiff's counsel deposed Menzies' Human Resources Manager Tracy Aguilera. Following that deposition, in addition to receiving a certified copy of the transcript of that deposition, I received a condensed copy of the transcript of the deposition, and I have read, reviewed and maintained a copy of those transcripts in connection with this matter. A true and correct copy of the condensed transcript of Ms. Aguilera's deposition is attached hereto as **Exhibit 49**. Because Exhibit 49 is offered in its entirety to show Plaintiff's counsel never inquired about certain allegations made by Plaintiff regarding Andrew Dodge, making the entire deposition transcript relevant, I am

1 providing the condensed transcript to reduce the amount of material filed with the Court.

2 5. On August 25, 2020, Plaintiff's counsel deposed Menzies' former SFO Director of
3 Operations Raul Vargas. Following that deposition, in addition to receiving a certified copy of the
4 transcript of that deposition, I received a condensed copy of the transcript of the deposition, and I have
5 read, reviewed and maintained a copy of those transcripts in connection with this matter. A true and
6 correct copy of the condensed transcript of Mr. Vargas's deposition is attached hereto as **Exhibit 50**.
7 Because Exhibit 50 is offered in its entirety to show Plaintiff's counsel never inquired about certain
8 allegations made by Plaintiff regarding Andrew Dodge, making the entire deposition transcript relevant,
9 I am providing the condensed transcript to reduce the amount of material filed with the Court.

10 6. On July 28, 2020, Plaintiff's counsel deposed Menzies' Fueling Supervisor Andrew
11 Dodge. Following that deposition, in addition to receiving a certified copy of the transcript of that
12 deposition, I received a condensed copy of the transcript of the deposition, and I have read, reviewed
13 and maintained a copy of those transcripts in connection with this matter. A true and correct copy of the
14 condensed transcript from Mr. Dodge's deposition is attached hereto as **Exhibit 51**. Because Exhibit 51
15 is offered in its entirety to show Plaintiff's counsel never inquired about certain allegations made by
16 Plaintiff regarding Andrew Dodge, making the entire deposition transcript relevant, I am providing the
17 condensed transcript to reduce the amount of material filed with the Court.

18 7. On July 28, 2020, Plaintiff's counsel deposed Menzies' Senior Vice President of U.S.
19 Fuel Consortiums Randall Davies. Following that deposition, in addition to receiving a certified copy of
20 the transcript of that deposition, I received a condensed copy of the transcript of the deposition, and I
21 have read, reviewed and maintained a copy of those transcripts in connection with this matter. A true
22 and correct copy of the condensed transcript from Mr. Davies' deposition is attached hereto as **Exhibit**
23 **52**. Because Exhibit 52 is offered in its entirety to show Plaintiff's counsel never inquired about certain
24 allegations made by Plaintiff regarding Andrew Dodge, making the entire deposition transcript relevant,
25 I am providing the condensed transcript to reduce the amount of material filed with the Court.

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1 I declare under penalty of perjury under the laws of the States of California and Illinois, and the
2 laws of the United States, that the foregoing is true and correct.

3 Executed on November 5, 2020 at Chicago, Illinois.

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6 /s/ Christopher Ward
Christopher Ward
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